

WILMERHALE

January 6, 2020

Daniel P. Kearney

**VIA ECF AND E-MAIL**

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Hon. Thomas I. Vanaskie  
Stevens & Lee  
425 Spruce Street, Suite 300  
Scranton, PA 18503

Re: *CFPB v. Navient Corp., et al.*, Case No. 3:17-CV-00101-RDM (M.D. Pa.)

Dear Judge Vanaskie:

Pursuant to Special Master Order No. 59, Navient respectfully submits this letter (1) attaching a declaration supporting the assertion of work product protection in connection with the expert report of Mr. Beji Varghese, and (2) reporting whether Defendants intend to amend paragraphs 31 and 92 of the report of Dr. Xiaoling Lim Ang.

With respect to the first issue, the attached declaration shows that the requested communications are protected by Federal Rule 26(b)(4)(C) and the work product doctrine because they involve communications in preparation for trial between Defendants' counsel and assistants for Mr. Varghese and between Defendants' counsel and Defendants' employee. Regarding the second issue, Defendants do not intend at this time to amend paragraphs 31 and 92 of the report of Dr. Ang.

Sincerely,

A handwritten signature in black ink that reads "Daniel P. Kearney" followed by a stylized monogram or initials.

Daniel P. Kearney